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N62661.AR 001784
NAVSTA NEWPORT RI
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C-NAVY-08-04-1739W

August 12, 2004

Project Number N4152

Mr. Curtis Frye
Remedial Project Manager
EFA Northeast, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-94-D-0888
Contract Task Order No. 0833

Subject: Response to Comments on the Draft Action Memorandum, Mound Removal
Old Fire Fighting Training Area
Naval Station Newport, Newport Rhode Island

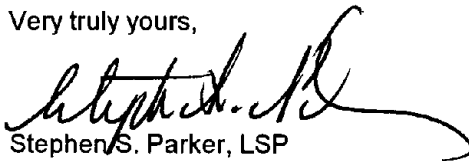
Dear Mr. Frye:

Enclosed for your records, you will find responses to comments from the U.S. Environmental Protection Agency on the draft Action Memorandum describing the removal of the soil and debris mounds at the site referenced above.

Based on these comments and responses, the Action Memo will be finalized and forwarded to NAVSTA for signature. Copies will be distributed to the IR Program review parties after signature.

If you have any questions regarding this material, please do not hesitate to contact myself or Jim Forrelli.

Very truly yours,



Stephen S. Parker, LSP
Project Manager

SSP/rp

Enclosure

c: K. Keckler, USEPA (w/encl. - 4)
P. Kulpa, RIDEM (w/encl. - 4)
S. McFadden, TAG (w/encl.)
C. Mueller, NAVSTA (w/encl. - 2)
J. Stump, Gannett Fleming (w/encl. - 2)
J. Trepanowski/G. Glenn, TtNUS (w/encl.)
File N4152-3.2 w/o encl, N4152-8.0 (w/encl.)

ATTACHMENT A
Response to Comments to the Draft Action Memo
Non-Time Critical Removal Action, Soil and Debris Mound Removal
Comments from USEPA Dated August 5, 2004

<u>Page</u>	<u>Comment</u>
p. 1	<p><i>Portions of the base are also located in the Town of Jamestown, RI.</i></p> <p>Response: Navy concurs, this revision will be made.</p>
p. 2	<p><i>The estimated depth to groundwater and anticipation of encountering groundwater during the removal action is not included in the site description. Information about groundwater would be good to include in the site description.</i></p> <p>Response: Navy concurs, this information will be added, however, removal of the mounds is not likely to interact with groundwater.</p>
p. 5, §6	<p><i>Total site risks, as reported in the Phase I RI, were much higher and should be listed here.</i></p> <p>Response: The site risks as measured in the Final RI (July 2001) are stated, as they were developed using both phase 1 and later data, and are more pertinent to the current condition.</p>
p. 6	<p><i>The proposed actions are briefly stated. Fence removal or modification to allow equipment access and then to secure the work area is not included as an action. The restriction of access through fencing and posting of warning signs in the area is not specified. It is important that access is restricted during the removal action.</i></p> <p>Response: The Navy concurs, this will be included.</p>
p. 6, ¶3	<p><i>The Central Mound, Mound No. 1, and Mound No. 2 volumes presented in the table do not correspond to the volumes specified in the Excavation, Transportation and Disposal Services Work Plan. For example, the Central Mound volume is specified as having a total volume of 9,500 cubic yards in the Action Memo and a volume of approximately 7,000 cubic yards in the Excavation, Transportation and Disposal Services Work Plan.</i></p> <p><i>The total volume of the mounds presented in the Action Memo (15,100 cy) is not consistent with the volume used in the FS cost estimate (10,900 cy).</i></p> <p>Response: Volumes stated were reviewed. The volume in the FS cost estimate includes the in-place mound volumes only. The excavation volume in the Action Memo page 6 includes expansion of that soil after removal and the additional volume required to accommodate the excavation to a depth of 1 foot below base grade elevation which is necessary for acceptable regrading and restoration. The volume stated in the Action Memo will be rectified with the Mound Removal Work Plan.</p>
p. 7	<p><i>Confirmatory sampling is not discussed in the text. Will soil data be collected and compared to the removal action goals specified in Table 1?</i></p> <p>Response: Confirmatory sampling is not anticipated, because the soils under the mounds are considered actionable, and will be addressed under a future removal action.</p>

p. 8, e *Add RCRA and its implementing regulations.*

Response: RCRA and implementing regulations are already stated within this section, on page 7, fourth bullet.

p. 8, §9 *No information has been provided to EPA to demonstrate that the hydrocarbons are degrading with bacterial action or that concentrations are decreasing. Please delete these statements from the Action Memorandum.*

Response: This statement is being reviewed and will be revised.

Attachment C *The Administrative Record should include the documents used as the basis for the decision. The NUSC disposal area SASE was inadvertently listed as part of the Administrative Record and should be deleted from the table. The September 2002 OFFTA FS is not listed as part of the Administrative Record. Information contained within the September 2002 FS was used as a basis for the decision and thus needs to be listed in the Administrative Record and be available for public review.*

Response: The Navy concurs and these revisions will be made.